

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 3/17/2023

Saiber
ATTORNEYS AT LAW

WRITER'S DIRECT DIAL: (973) 645-4815
WRITER'S DIRECT E-MAIL: vproto@saiber.com

Defendant's request is GRANTED.
The conference previously scheduled
for April 4, 2023 is rescheduled for
April 12, 2023 at 11:30 AM.



Jennifer H. Rearden, U.S.D.J.
Date: March 17, 2023

March 15, 2023

VIA ECF

Hon. Jennifer H. Rearden, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street, Room 1010
New York, New York 10007

**Re: 357-359 Sixth Avenue Associates, LLC and Seneca Insurance
Company, Inc. v. United States Liability Insurance Company
Civil Action No. 1:23-cv-220**

Dear Judge Rearden:

We are counsel for Defendant United States Liability Insurance Company ("USLI").

On behalf of USLI, we are writing to request an adjournment of the Initial Pretrial Conference scheduled for April 4, 2023 at 11:30 a.m. The reason for this request is that I have a previously-scheduled mediation in another matter on April 4, 2023. Counsel for Plaintiffs 357-359 Sixth Avenue Associates, LLC and Seneca Insurance Company have consented to this request.

There have been no previous requests for an adjournment of the Initial Pretrial Conference, and there are no other scheduled appearances or existing deadlines in this case.

We have consulted with Plaintiffs' counsel on available dates for the Initial Pretrial Conference and can report that counsel for the parties are available from April 10-21, except for April 20 and the morning of April 11.

Accordingly, for the reasons stated herein, we respectfully request an adjournment of the Initial Pretrial Conference scheduled for April 4, 2023.

Respectfully submitted,



VINCENT J. PROTO

cc: Eric A. Portuguese, Esq. (via email)
Jonathan Glasser, Esq. (via email)